

**DHS & Union Representation Forum on the
Advanced Notice of Rulemaking for Chemical Facility Anti-terrorism Standards**

January 16, 2007

Attendees: Christina McDonald, DHS Office of General Counsel; Daniel O'Connell, United Transportation Union; Al Martinez Fonts, DHS Private Sector Office; Lawrence Stanton, DHS Risk Management Division; Mike Flynn, IAMAN; David Houser, DHS Office of General Counsel; Stephen Thayer, DHS Policy; Dennis Deziel, DHS Office of Infrastructure Protection; Deborah Weinstock, MDB/National Institute of Environmental Health Science National Clearinghouse; Tom McQuiston, Tony Mazzocchi CTR; Liz Bettinger, United Steelworkers, Legislative; Bridget Martin, International Board of Boilermakers; Vincent Panvin, Sheet Metal Worker International Association; Jan Mares, DHS Private Sector Office; Luckie McClintock, Union of International Associations; Seth Morris, International Union of Operating Engineers; Jo Deutsch, United Food and Commercial Workers; Meghan Ludtke, DHS Office of General Counsel; Larry Gregoire, United Food and Commercial Workers; John Morawetz, International Chemical Workers Union Council/United Food and Commercial Workers

Summary: Participants had concerns over background investigations, which could jeopardize the employment status of long-term employees that have been working in a given facility for an extended period of time. Attendees voiced concern that the regulations did not state that workers be engaged in drill and exercises, and are also in favor of state security laws superseding DHS regulations if those state regulations may be more effective than Federal oversight. No state should be able to weaken Federal regulations, but if a given state's regulations are stronger they should be allowed to stand.